

3. From 1972 to 1979 I served as a Captain in the United States Army, which included a tour of duty in Thailand and assignments in Europe and the United States.

4. From 1979 until 2002, I was employed by the FBI. I began my career with the FBI as a Special Agent focused on Securities Fraud. In that role, I successfully investigated the use of overstated revenues in an initial public offering, which was the first criminal prosecution of Revenue Recognition Fraud tried to a jury in the United States.

5. As a Supervisory Special Agent, I supervised a squad of 15 FBI Special Agents and Financial Analysts who were responsible for investigating allegations of public corruption, procurement fraud, and civil rights violations in the greater Boston metropolitan area. I was responsible for on-scene supervision of the execution of search and arrest warrants; facilitating communications between and among federal and local law enforcement and regulatory agencies; managing the development of investigative strategies and techniques; and coordinating prosecution plans with the United States Attorney's Office.

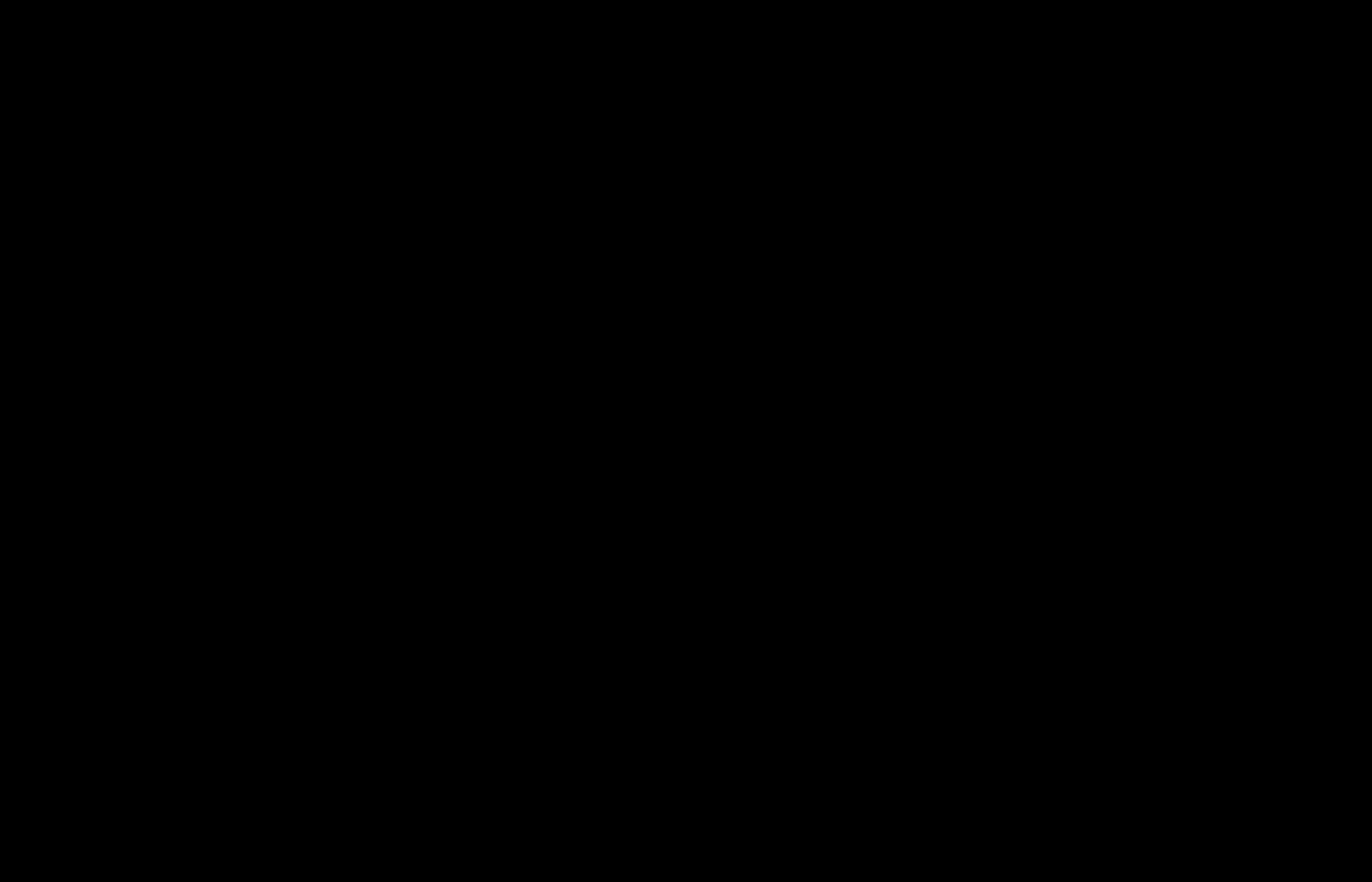
6. After the tragic events of September 11, 2001, I managed the day-to-day investigative activities of 500 federal, state, and local law enforcement officials who functioned as investigative resources during the ensuing investigation. My responsibilities included prioritizing and assigning interviews, distilling the results of interviews, and coordinating with the command post.

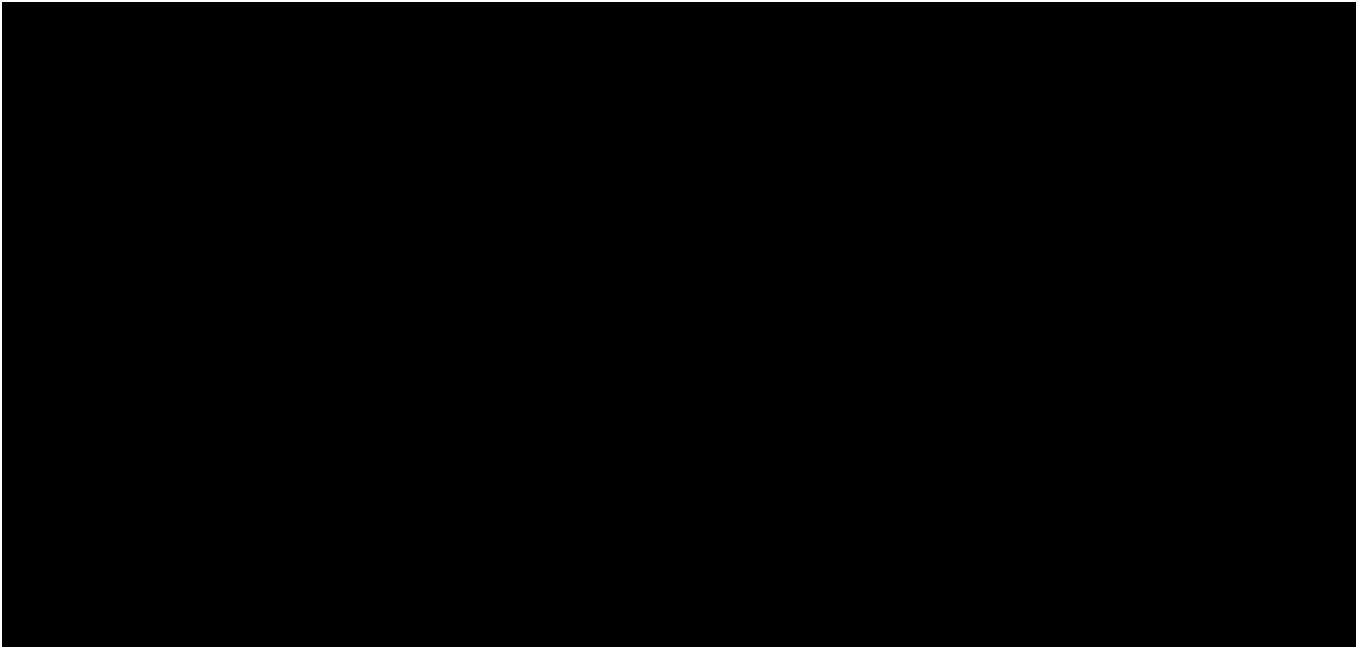
7. In 2002, I served as the Assistant Section Chief of the FBI's Terrorist Financing Operations Section, which was formed in response to the critical need identified after the World Trade Center attacks to develop a more comprehensive and centralized approach to terrorist financing matters. I developed investigative protocols; provided direct supervision to a multi-agency task force consisting of representatives from federal law enforcement and regulatory

agencies; and represented the FBI in working groups addressing issues such as implementation of the Patriot Act. I also oversaw the preparation of terrorist financing materials and related information used by the Director of the FBI in testimony before Congress and in briefings to the President of the United States.

8. I retired from the FBI in October 2002. In early 2003, I became a Principal Investigator for Fidelity Investments. In that role, I drafted Suspicious Activity Reports and served as a primary point of contact with law enforcement agencies. I also analyzed customer account activity to determine whether the activity warranted the filing of a Suspicious Activity Report.

9. I am currently the Owner of The Egan Group, where I conduct private investigations focusing on the areas of financial investigation, business due diligence, and litigation support. I am a Licensed Private Investigator.





Structure of Terrorist Cells

13. In my experience, terrorist cells are comprised of three components: training, execution, and funding. The military-style training of cell members takes place at secure and secret camp locations in foreign countries, with a focus on mission-readiness for the execution of attacks whether planned for inside or outside of the United States. Along with members who supervise and conduct the training, financial supporters of terrorist cells are usually separated from and do not participate in the terrorist attacks they sponsor and, further, are not informed about and therefore have no knowledge of logistical plans or operational details of the attacks, or of the identities of those who actually conduct the attacks. The obvious purpose of this compartmentalized structure is to frustrate the investigation and prosecution of terrorist cell members.

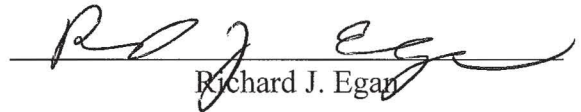
Islamic Society of Boston

14. The Islamic Society of Boston is a mosque located at 100 Malcom X Boulevard in Roxbury, Massachusetts. It is well-known among law enforcement officials that the Islamic

Society of Boston tends to attract a transient congregation, including students. It is also well known among law enforcement officials that there are longstanding questions about the Islamic Society of Boston's involvement in financing terrorist activity. Upon information and belief, approximately 40 members of the Islamic Society of Boston have been or remain under investigation by federal law enforcement authorities based on suspected financial support of terrorism-related activities.

15. Based on my experience and under the circumstances, investigating whether Plaintiff or his family members had a connection to the Islamic Society of Boston would have been a logical and appropriate line of inquiry.

**SWORN AND SUBSCRIBED TO UNDER THE PAINS AND PENALTIES OF
PERJURY THIS 27th DAY OF MAY 2016.**


Richard J. Egan